

*Jane Doe 1, et al. v. Gov't of the U.S. Virgin Islands, et al.*

1:23-cv-10301-AS

**Defendant Congresswoman Stacey Plaskett's Rule 8(G) Chart**  
**Elements of Each Claim Not Plausibly Alleged**

**I. COUNT I: VIOLATION OF THE TVPA**

<b>Elements</b>	<b>12(b)(6) Motion for Failure to Plausibly Allege Elements</b>
Defendant knowingly received a benefit or something of value	
From participating in a sex trafficking adventure	Not plausibly alleged.
That the defendant knew or should have known was engaged in a violation of the TVPA	Not plausibly alleged.

(Elements from *S.J. v. Choice Hotels Int'l, Inc.*, 473 F. Supp. 3d 147, 152–53 (E.D.N.Y. 2020) (quoting *A.C. v. Red Roof Inns, Inc.*, 2020 WL 3256261, at \*4 (S.D. Ohio June 16, 2020)).

**II. COUNT II: AIDING AND ABETTING A VIOLATION OF THE TVPA**

\* Not a viable cause of action.

<b>Elements</b>	<b>12(b)(6) Motion for Failure to Plausibly Allege Elements</b>
The principal performs a wrongful act that causes injury;	
The defendant is generally aware of his or her role in the illegal or tortious activity;	Not plausibly alleged.
The defendant provided substantial assistance to the principal.	Not plausibly alleged.

(Elements from *Kaplan v. Lebanese Canadian Bank, SAL*, 999 F.3d 842, 856 (2d Cir. 2021) (evaluating claims under the Justice Against Sponsors of Terrorism Act)).

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**III. COUNT II: CONSPIRACY TO VIOLATE THE TVPA**

<b>Elements</b>	<b>12(b)(6) Motion for Failure to Plausibly Allege Elements</b>
The Defendant agrees to enter into a joint enterprise;	Not plausibly alleged.
With consciousness of the general nature and extent of the joint enterprise	Not plausibly alleged.

(Elements from *Doe I v. Deutsche Bank Aktiengesellschaft*, 671 F. Supp. 3d 387, 412 (S.D.N.Y. 2023)).

**IV. COUNT IV: NEGLIGENCE**

<b>Elements</b>	<b>12(b)(6) Motion for Failure to Plausibly Allege Elements</b>
A duty owed to the plaintiff;	Not plausibly alleged.
A breach of the duty;	Not plausibly alleged.
Resulting in injury proximately caused by the breach;	Not plausibly alleged.

(Elements from *David v. Weinstein Co. LLC*, 431 F. Supp. 3d 290, 305 (S.D.N.Y. 2019)).